

September 28, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

In the Matter of

Amendment of Part 22 of the Commission's Rules to Benefit the Consumers of Air-Ground
Telecommunications Services, WT Docket No. 03-103

Reference: American Airlines' August 30th electronically filed comments to WT Docket 03-103.

On August 30, 2004 American Airlines submitted comments regarding the Federal Communications Commission's re-examination of the rules governing the provision of air-ground telecommunications services on commercial aircraft.

The purpose of this second submittal is to clarify a recommendation made in the August 30th submittal, and to make an additional recommendation.

Regarding the number of service providers that will be licensed to use the 4MHz wide spectrum, the goal should be that the service provider(s) licensed to use the subject spectrum be able to provide broadband air-ground connectivity. The number of service providers allowed to operate in the spectrum should be limited only as necessary to ensure that all of the service provider(s) can simultaneously provide broadband connectivity.

American Airlines favors a competitive arena in not only the subject 4MHz wide spectrum, but also in the broader market of passenger air-ground communications for commercial aviation use.

Additionally, American Airlines encourages the FCC to complete their review and make a final disposition of the subject 4MHz wide spectrum, in a timely manner. This will allow potential service providers to move from the prototyping phase of system development to development of commercially offerable systems.

Regards,

Rich Farr
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American Airlines